



ADVOCARE®
We Build Champions

January 25, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

FEB 14 2005

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, AdvoCare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road, Suite 134
Carrollton, TX 75006

Product Name: KickStart Complete
Statement(s)

Basis for Statement

Provides nutritional metabolic support for
general health and well being

Riboflavin	Folic Acid
Thiamine	Riboflavin
Biotin	Inositol
Iodine (from amino acid chelate)	
Niacin (as niacinamide)	Iron (as amino acid chelate)
Vitamin A (as palmitate and as beta-carotene)	
Vitamin C (as ascorbic acid and sodium ascorbate)	
Vitamin D (as cholecalciferol)	
Vitamin E (as d-alpha tocopheryl succinate)	
Vitamin B-6 (as pyridoxine HCl)	
Vitamin B-12 (as cyanocobalamin)	
Pantothenic acid (as calcium pantothenate)	
Calcium (as carbonate and amino acid chelate)	
Magnesium (as oxide and amino acid chelate)	
Zinc (as amino acid chelate)	
Selenium (L-selenomethionine)	
Copper (as amino acid chelate)	
Manganese (as amino acid chelate)	
Chromium (as chromium citrate)	
Molybdenum (as amino acid chelate)	
Boron (as amino acid chelate)	
Choline (as choline bitartrate)	
Coenzyme Q-10	
Mixed carotenoids (from D. salina)	
Grape extract (seed/skin - Vitis Vinifera)	

97S 0162

LET

15596

Supports healthy bone structure and growth

Riboflavin	Folic Acid
Thiamine	Riboflavin
Biotin	Inositol
Calcium (as amino acid chelate)	Phosphorus (as amino acid chelate)
Iodine (from amino acid chelate)	Magnesium (as amino acid chelate)
Zinc (as zinc monomethionine)	Selenium (selenomethionine)
Copper (as amino acid chelate)	Manganese (as amino acid chelate)
Chromium (as chromium citrate)	Molybdenum (as amino acid chelate)
Potassium (as potassium chloride and amino acid chelate)	
Boron (as amino acid chelate)	
Vanadium (as bis-maltolato-oxovanadium)	

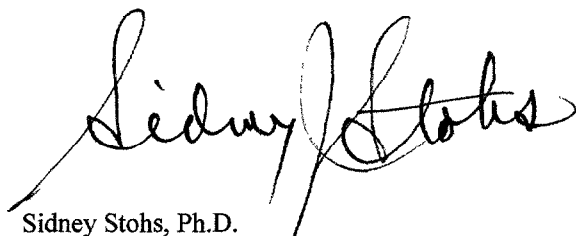
Has antioxidant activity

Vitamin A (as palmitate and as beta-carotene)
Vitamin C (as ascorbic acid and sodium ascorbate)
Vitamin E (as d-alpha tocopheryl succinate)
Selenium (selenomethionine)
Zinc (as amino acid chelate)
Coenzyme Q-10
Mixed carotenoids (from D. salina)
Grape extract (seed/skin – Vitis Vinifera)

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that AdvoCare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,



Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.